

EXHIBIT “A”

July 28, 2023

Robert Seitzer
1900 Spruce Street
Philadelphia, PA 19103 USA

Attention:

MATTER: 6022-a
INVOICE: 1167

Thomas J. Prim
OBJECTION TO EXEMPTIONS

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Apr-14-23	Research re: structured settlements and exemptions	2.40	1,080.00	RWS
Apr-17-23	Prepared Objection to Exemptions	2.00	900.00	RWS
Apr-18-23	Additional research re: exemption issues & Qualified Orders	2.40	1,080.00	RWS
Apr-19-23	Prepared final draft of Objection to Exemptions	2.80	1,260.00	RWS
May-05-23	Initial research re: new exemptions claimed by the Debtor	2.30	1,035.00	RWS
May-11-23	Review of State Court pleadings that resulted in Structured Settlement to prepare New Objection to Exemptions	1.60	720.00	RWS
May-12-23	Research re: (d)(11)(D) exemption claimed by Debtor	1.20	540.00	RWS
May-17-23	Prepared Second Objection to Exemptions	3.40	1,530.00	RWS
May-18-23	Research re: new exemptions claimed by Debtor	2.90	1,305.00	RWS
	Prepared revised Second Objection to Exemptions	3.10	1,395.00	RWS
May-19-23	Research re: tax consequences of structured settlements re: amended exemptions	2.10	945.00	RWS
May-30-23	Telephone conference with Cibik and Assad re: settlement proposal	0.10	45.00	RWS
May-31-23	Research re: additional research on amended exemptions claimed by Debtor	1.30	585.00	RWS

Jun-02-23	Prepared final revisions to Second Objection to Exemptions to incorporate Rule 2004 facts	2.90	1,305.00	RWS
Jun-12-23	Prepared proposed terms for Consent Order	0.40	180.00	RWS
Jun-14-23	Prepared Proposed Order re: Zoom Hearing on Objection to Exemptions	0.30	135.00	RWS
Jun-16-23	Prepared email to Assad re: trying to resolve everything	0.10	45.00	RWS
Jul-06-23	Prepared Subpoena re: Hearing on Objection to Exemption	0.50	225.00	RWS
	Letter to Assad re: Hearing on Objection to Exemption	0.30	135.00	RWS
Jul-20-23	Prepared Witness list re: hearing on Objection to Exemptions	0.50	225.00	RWS
	Prepared Exhibit list re: hearing on Objection to Exemptions	0.50	225.00	RWS
Jul-25-23	Review of proposed Settlement Terms	0.10	45.00	RWS
Jul-27-23	(2) Telephone conferences with Assad re: potential settlement of pending motions	0.30	135.00	RWS
	Review of Settlement Proposal	0.20	90.00	RWS
	Totals	33.70	\$15,165.00	

FEE SUMMARY:

Lawyer	Hours	Effective Rate	Amount
Robert W. Seitzer	33.70	\$450.00	\$15,165.00

Balance Due Now**\$15,165.00**

July 28, 2023

Robert Seitzer
1900 Spruce Street
Philadelphia, PA 19103 USA

Attention:

MATTER: 6022-a
INVOICE: 1168

Thomas J. Prim
OBJECTION TO MOTION TO CONVERT

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
May-02-23	Research re: conversion to Chapter 13	0.90	405.00	RWS
	Prepared Objection to Motion to Convert	2.50	1,125.00	RWS
Jun-07-23	Review of Response to Objection to Motion to Convert	0.30	135.00	RWS
Jun-13-23	Prepared request to Adjourn Hearing on Motion to Convert	2.10	945.00	RWS
Jun-14-23	Review of Debtor's Response to Request to Adjourn Hearing on Motion to Convert	0.10	45.00	RWS
	Prepared for Hearing on Motion to Convert	0.50	225.00	RWS
	Telephonic Court Appearance re: Motion to Convert	0.70	315.00	RWS
	Totals	7.10	\$3,195.00	

FEE SUMMARY:

Lawyer	Hours	Effective Rate	Amount
Robert W. Seitzer	7.10	\$450.00	\$3,195.00

Balance Due Now **\$3,195.00**

July 28, 2023

Robert Seitzer
1900 Spruce Street
Philadelphia, PA 19103 USA

Attention:

MATTER: 6022-a
INVOICE: 1169

Thomas J. Prim
BANKRUPTCY RULE 2004 EXAMINATION

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
May-15-23	Letter to Assad re: 2004 Exam	0.50	225.00	RWS
May-22-23	Prepared e-mail to Assad re: 2004 Exam	0.10	45.00	RWS
	Prepared Notice of Rule 2004 Exam	0.30	135.00	RWS
Jun-01-23	Prepared for Debtor's 2004 Exam	1.10	495.00	RWS
	Prepared questions for Debtor's 2004 Exam	1.20	540.00	RWS
Jun-02-23	Attend Debtor's Zoom 2004 Exam	0.40	180.00	RWS
	Totals	3.60	\$1,620.00	

FEE SUMMARY:

Lawyer	Hours	Effective Rate	Amount
Robert W. Seitzer	3.60	\$450.00	\$1,620.00

Balance Due Now **\$1,620.00**

July 28, 2023

Robert Seitzer
1900 Spruce Street
Philadelphia, PA 19103 USA

Attention:

MATTER: 6022-a
INVOICE: 1166

Thomas J. Prim

DISBURSEMENTS

	Research - Copy Charge	2.60
	Objection - Copy Charge	74.40
	Exhibits - Copy Charge	13.60
	Correspondence - Copy Charge	0.60
	Certificate of No Objection - Copy Charge	0.60
	Motion - Copy Charge	3.60
	Notice - Copy Charge	4.00
	Fee Application - Copy Charge	5.00
Apr-19-23	Mail - Objection - 1 - Prim	2.52
May-11-23	Complaint and Answer from the Philadelphia Court of Common Pleas	10.50
Jun-05-23	Mail - Objection - 1 - Prim	2.28
Jun-19-23	Zoom Remote Video Conference of Thomas Prim, taken on 6/2/23 by Esquire	435.00
Jul-06-23	Mail - Correspondence - 1 - Prim	0.60
Jul-28-23	Mail - Notice - 10 - Prim	6.30
	Totals	\$561.60

Balance Due Now

\$561.60